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*The Trusted Integrator for Sustainable Solutions*

REMOVAL SUPPORT TEAM 3  
EPA CONTRACT EP-S2-14-01

September 11, 2014

Mr. Angel Rodriguez, On-Scene Coordinator  
U.S. Environmental Protection Agency  
Response and Prevention Branch  
Caribbean Environmental Protection Division, Region II  
1492 Peñuelas De Leon Ave., Suite 417  
San Juan, PR 00907-4127

Dear Mr. Rodriguez,

The activities performed and the data collected on September 9, 2014 at the Puerto Rico Olefins Asbestos Site located in Peñuelas, Puerto Rico are summarized in this attached document. Field activities consisted of documenting the weight of friable asbestos containing material (ACM) in order to collect a minimum of 1 pound as requested. The material was collected at the same locations where bulk samples were collected in November 2013. On August 26, 2014, on-site stockpiles volumes were calculated and are summarized in Table 1 of the attached. The bulk material sample locations were used to locate and measure the weight of the friable ACM. A digital scale (Protege Digital Scale, Model: PR5822BK17WAN) was used to measure the weight of the material in pounds. The material was identified and collected with dedicated disposable 8 oz. scoops into 5 gallon plastic buckets. The scale was capable of zeroing on the tare (*i.e.*, 5 gallon buckets) providing a direct weight of the collected material. The total weight of the material collected is summarized in Table 2 of the attached. Three buckets were filled for sample ACM-001-001 (Material Location L); three buckets were filled for sample ACM-001-002 (Material Location L); and one bucket was filled for sample ACM-004-001 (Material Location K). A total of seven buckets were filled with friable ACM. Each bucket was sealed with a lid and tape and labeled with a marker showing sample number, location, and date. Custody seals were also affixed to the buckets. Each bucket was left at each location and no material was removed from the Site.

Photos of the on-site volume estimate activities were collected. The photos have been included in a photolog along with the photos that correspond to the reference samples (*i.e.*, Material Locations L and K). The U.S. Environmental Protection Agency comments in regards to the draft version of the document have been incorporated. If you have any questions or comments, please do not hesitate to call me at (787) 385-9290.

Sincerely,

Angel Alicea  
RST 3 Team Member

*an employee-owned company*

In association with Scientific and Environmental Associates, Inc.,  
Environmental Compliance Consultants, Inc., Avatar Environmental, LLC,  
On-Site Environmental, Inc., and Sovereign Consulting, Inc.



**Puerto Rico Olefins Asbestos Removal**  
**Peñuelas, Puerto Rico**  
**August 26, 2014**

**Table 1**

Material Location (Refer to Site Map)	Description	Samples Collected	Dimensions (Feet)		Estimated Volume	
			Pile Area (ft²)	Height (ft)	Total (ft³)	Cubic Yards (yd³)
A	Insulation Material	ACM-003-001 S0001-0006-001 W-001-001	Approximately 5 gallons		0.67	<b>0.02</b>
B	Metal Pile	W-002-001	2,883	8	23,064	<b>854.22</b>
C	Mixed Waste Pile	None	2,093	5	10,465	<b>387.59</b>
D	Metal Pile	W-003-001 P0001-ACM006-01	5,861	6	35,166	<b>1,302.44</b>
E	Metal Pile	None	1,413	4	5,652	<b>209.33</b>
F	Metal Pile	None	2,263	6	13,578	<b>502.89</b>
G	Metal Pile	W-005-001	209	4	836	<b>30.96</b>
H	Aluminum Pile	None	1,620	8	12,960	<b>480.00</b>
I	Mixed Waste Pile	None	523	5	2,615	<b>96.85</b>
J	Metal Pile	None	2,512	15	37,680	<b>1,395.56</b>
K	Insulation Material	ACM-004-001	Approximately 20 gallons		2.67	<b>0.10</b>
L	Insulation Material	ACM-001-001 ACM-001-002	Approximately 10 gallons		1.33	<b>0.05</b>
M	Mixed Waste Pile	None	4,286	1	4,286	<b>158.74</b>
N	Metal Pile	None	707	4	2,828	<b>104.74</b>
O	Brick Piles (total)	P0001-ACM005-01	61,753	4	247,012	<b>9,148.59</b>
P	Metal Pile	None	314	10	3,140	<b>116.30</b>
Q	Mixed Waste Pile	None	1,675	18	30,150	<b>1,116.67</b>
R	Mixed Waste Pile	None	4,019	6	24,114	<b>893.11</b>
S	Metal Pile	None	3,533	7	24,731	<b>915.96</b>
T	Insulation Material	ACM-002-001	Approximately 5 gallons		0.67	<b>0.02</b>

**Puerto Rico Olefins Asbestos Removal**  
**Peñuelas, Puerto Rico**  
**September 9, 2014**

**Table 2**

Material Location (Refer to Site Map)	Description	Bulk Samples Collected	Asbestos % Type		Material Weight (lbs)			Abestos % Weight (lbs)		Description	
			Amosite	Chrysotile	Weight Needed for 1 lb of Amosite	Weight Needed for 1 lb of Chrysotile	Total Material Weight	Amosite	Chrysotile	Friable	Moisture
A	Insulation Material	ACM-003-001	40	2	NA	NA	NA	NA	NA	NA	NA
K	Insulation Material	ACM-004-001	2	20	50	5	<b>11.31</b>	<b>0.2262</b>	<b>2.262</b>	Yes	Dry
L	Insulation Material	ACM-001-001	35	5	3	20	<b>31.26</b>	<b>10.941</b>	<b>1.563</b>	Yes	Dry
		ACM-001-002	30	6	3	17	<b>28.5</b>	<b>8.55</b>	<b>1.71</b>	Yes	Dry

NA – Not Applicable. There was not a sufficient amount of material in Material Location A to be collected.

**Puerto Rico Olefins Asbestos Removal – On-Site Volume Inventory Photolog**  
**Peñuelas, Puerto Rico**  
**August 26, 2014 and September 9, 2014**



**Photo 1:** Material Location K. Photo taken during site recon on August 26, 2014.



**Photo 2:** Friable ACM being collected and weighted at Material Location K.  
Photo taken on September 9, 2014.



**Puerto Rico Olefins Asbestos Removal – On-Site Volume Inventory Photolog**  
**Peñuelas, Puerto Rico**  
**August 26, 2014 and September 9, 2014**



**Photo 3:** Material from Material Location K was placed inside a 5 gallon bucket, labeled, and custody sealed on September 9, 2014.



**Photo 4:** Material from sample ACM-004-001 from Material Location K was weighted in a 5 gallon bucket on September 9, 2014.

**Puerto Rico Olefins Asbestos Removal – On-Site Volume Inventory Photolog**  
**Peñuelas, Puerto Rico**  
**August 26, 2014 and September 9, 2014**



**Photo 5:** Material Location L. Photo taken during site recon on August 26, 2014.



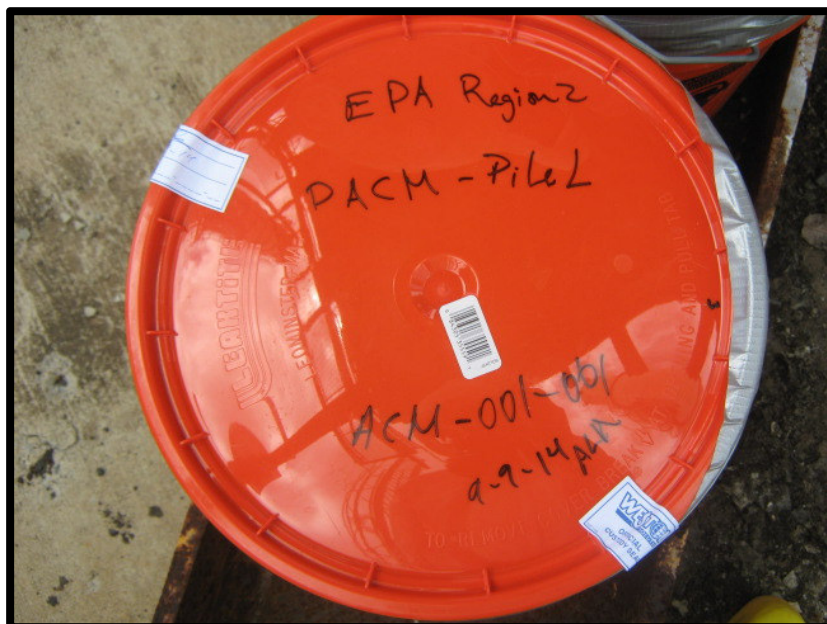
**Photo 6:** Sample ACM-001-001 being collected on November 21, 2013 from Material Location L.



**Puerto Rico Olefins Asbestos Removal – On-Site Volume Inventory Photolog**  
**Peñuelas, Puerto Rico**  
**August 26, 2014 and September 9, 2014**



**Photo 7:** Friable ACM was collected and weighted at Material Location L.  
Photo taken on September 9, 2014.



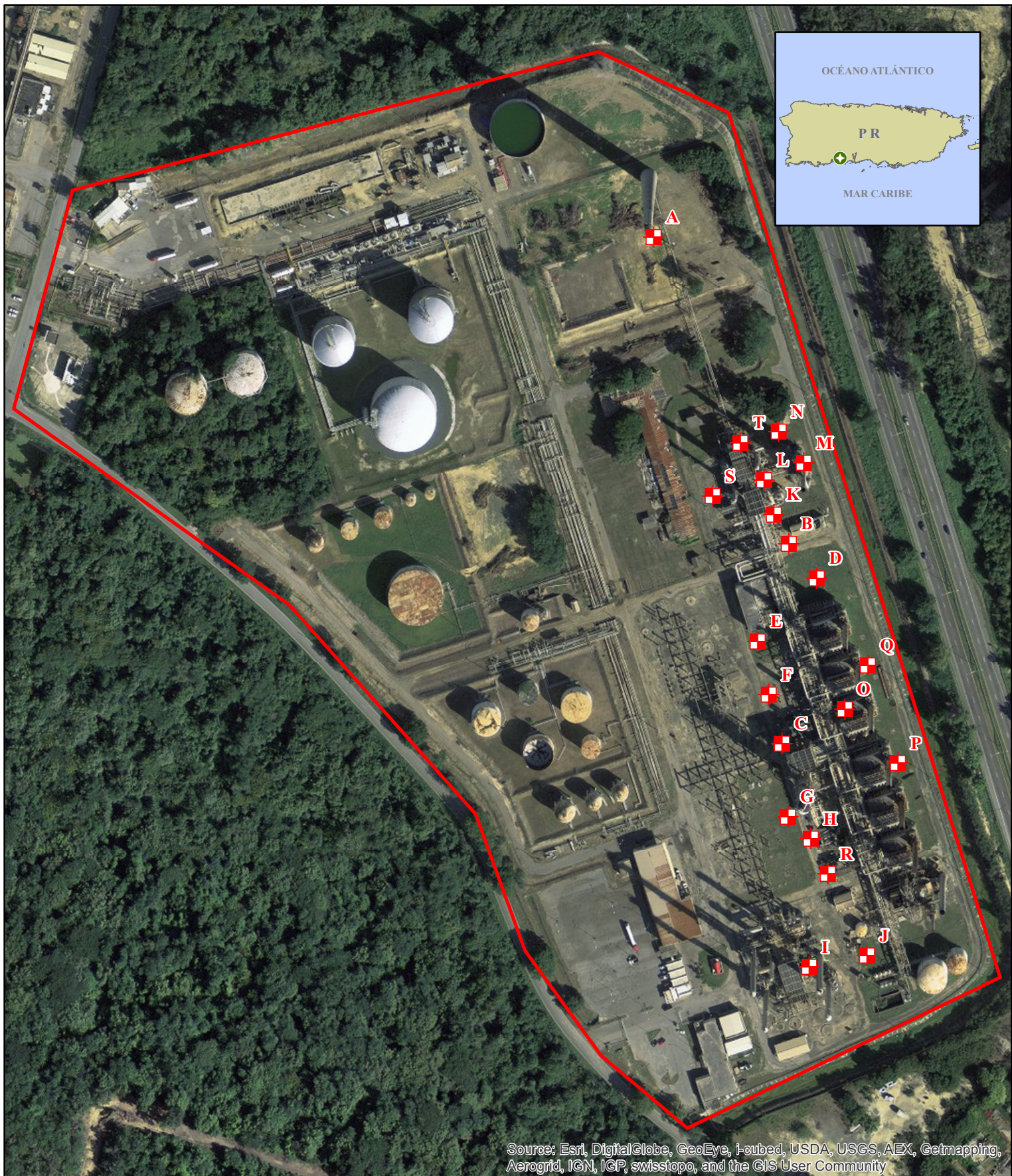
**Photo 8:** Material from Material Location L was placed inside a 5 gallon bucket, labeled, and custody sealed on September 9, 2014.

**Puerto Rico Olefins Asbestos Removal – On-Site Volume Inventory Photolog**  
**Peñuelas, Puerto Rico**  
**August 26, 2014 and September 9, 2014**



**Photo 9:** Material from samples ACM-001-001 and ACM-001-002 collected from Material Location L was weighted in 5 gallon buckets on September 9, 2014.





#### Legend

- On-Site Debris Pile Location
- Site Boundary

0 60 120 240 360 480 Feet



**Weston Solutions, Inc.**  
East Division

In association with  
Scientific and Environmental Associates, Inc.,  
Avatar Environmental, LLC, Environmental Compliance Consultants,  
On-Site Environmental, Inc., and Sovereign Consulting, Inc.

#### Figure 1: On-Site Debris Pile Location Map

PUERTO RICO OLEFINS ASBESTOS SITE  
PENUELAS, PUERTO RICO

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL SUPPORT TEAM 3  
CONTRACT # EP-S2-14-01

DATE MODIFIED: 8/28/2014  
GIS ANALYST: T. BENTON  
EPA OSC: A. RODRIGUEZ  
RST SPM: C. HUERTAS  
FILENAME: 140828\_PR Olefins\_On-Site Debris Pile Map.mxd